

From: [Schindler, Jason](#)
To: [Haklar, James](#)
Cc: [Devorak, Coleen](#)
Subject: RE: Hatco revision to Woodbridge Pond remediation approach
Date: Tuesday, April 04, 2017 3:42:20 PM

Hi Jim,

I left a message on your voice mail a little while ago. I think it would be easier to explain my thinking that way. Please give me a call when you get a few minutes.

Thanks,

Jason

Jason Schindler

Principal Project Manager

Weston Solutions, Inc.

205 Campus Drive

Edison, NJ 08837

Tel: 732-417-5804

Cell: 732-740-5529

Fax: 732-417-5801

www.westonsolutions.com

From: Haklar, James [mailto:Haklar.James@epa.gov]

Sent: Tuesday, April 04, 2017 3:20 PM

To: Schindler, Jason

Cc: Devorak, Coleen

Subject: RE: Hatco revision to Woodbridge Pond remediation approach

Jason,

Please see my questions (in bold) to certain statements in your message (highlighted).

Thanks,

Jim

Based on your initial feedback we have revised the plans for the remediation of Woodbridge Pond. The Conceptual Remediation Plan (Conceptual Plan) letter dated March 1, 2017 included a recommendation to conduct predesign sampling to define the limits of the excavation in advance in lieu of post-excavation sampling. Based on our discussion Weston understands that EPA will not consider a remediation approach that does not include post-excavation sampling. Weston has revised the proposed approach to perform the remedial action based on post-excavation samples rather than the predesign sampling described in the Conceptual Plan.

Based on the current excavation layout, confirmation samples will be required at 57 bottom locations and 37 perimeter side wall locations. On post-excavation sample will be collected after dredging at each of the 57 bottom locations. At each of the side wall locations two samples will be used to confirm the horizontal limits of the excavation after dredging: one at the top of the side wall and at the base of the side wall. The samples will be analyzed using an accelerated 24-hour turnaround time.

Weston proposes to rely on existing data to establish the excavation limits at 5 of the 57 bottom sample locations and 6 of the 37 side wall locations. Why? This will consist of samples previously collected at locations CP-37, CP-41, CP-42, CP-43, CP-44, CP-45, CP-54, CP-63, CP-64, CP-65 and CP-83. These 11 locations will be dredged to the limits based on the existing data; **no post-excavation**

samples will be collected at these 11 locations. **Why not?** Data for these locations are summarized on the figure that was included with the Conceptual Plan.

Contingency samples will be collected one foot below the bottom of the excavation at each of the post-excavation bottom and side wall locations to be sampled. The contingency samples will be submitted to the laboratory and held cool pending results of the confirmation sample analyses. If any of the confirmation sample results exceed the applicable criteria (1 mg/kg total PCBs and 22 mg/kg BEHP), then the contingency sample will be analyzed to evaluate the depth of further dredging. If the contingency sample results meet the criteria the dredge will be extended one foot at that location with no further sampling at that location. **If the contingency sample results exceed the criteria then further evaluation may be required before extending the excavation at that location.**

I'm not sure what this means. Why wouldn't the excavation be extended and additional post-dredging samples collected? Would EPA be involved in the decision-making process?

This post-excavation sampling will be performed in lieu of the predesign sampling described in the Conceptual Plan dated March 1, 2017. Apart from this modification the remediation will be performed as described in that letter. Please let me know if this approach is acceptable. Following your response we will complete Remedial Action Work Plan Addendum 4, for your review.

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